

# Exhibit C

FILED  
06-23-2021  
John Barrett  
Clerk of Circuit Court  
2021CV003759  
Honorable Timothy  
Witkowski-22  
Branch 22

Enter the name of the county in which this case is filed.	STATE OF WISCONSIN, CIRCUIT COURT, <u>MILWAUKEE</u> COUNTY		
Enter the Petitioner/Plaintiff's full name.	<b>Petitioner/Plaintiff:</b> <u>Stefanie</u> <u>Marvin, et al.</u> First name Middle name Last name		
Enter the Respondent/Defendant's full name.	<b>Respondent/Defendant:</b> <u>Kia America Inc, et al</u> First name Middle name Last name		
Enter the case number.	Case No. _____		

A motion to seal or redact a court record or transcript has been filed with the court.

#### THE COURT ORDERS:

The motion to

- ☒ 1. **seal** the requested information is granted for the reasons set forth in this motion. The clerk shall seal the following documents:

Summons and Complaint (Temporary)

Access to view document(s):

- ☒ Petitioner/Plaintiff    ☒ Respondent/Defendant    ☐ Social Worker    ☐ Guardian  
☐ Attorney    ☐ Guardian ad Litem    ☐ Probation

☒ Other: Milwaukee Police Department, NHTSA, and/or all other appropriate local officials.

- ☐ 2. **redact** the requested information is granted for the reasons set forth in this motion. The clerk shall redact the following information:

Access to view document(s):

- ☐ Petitioner/Plaintiff    ☐ Respondent/Defendant    ☐ Social Worker    ☐ Guardian  
☐ Attorney    ☐ Guardian ad Litem    ☐ Probation

☐ Other: \_\_\_\_\_

- ☐ The clerk shall perform the redaction as identified in this motion for previously filed documents.

- ☐ The parties shall omit or redact this information from all documents subsequently filed.

- ☐ 3. seal or redact is denied because

- ☐ A. the request lacks a sufficient legal basis.  
☐ B. the requester has not made a sufficient factual showing.  
☐ C. Other: \_\_\_\_\_

- ☐ 4. Other: \_\_\_\_\_

#### DISTRIBUTION:

1. Court  
 2. Parties  
 3. Petitioner, if not a party

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06-23-2021

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STATE OF WISCONSIN, CIRCUIT COURT,  
MILWAUKEE COUNTY

Enter the Petitioner/Plaintiff's full name.

Petitioner/Plaintiff:

Stefanie

First name

Middle name

Marvin, et al.

Last name

Respondent/Defendant:

Kia America Inc, et al

First name

Middle name

Last name

Enter the Respondent/Defendant's full name.

Enter the case number.

This form is used for all case types. Some information may not apply to your case.

# Motion to Seal or Redact a Court Record

Case No. \_\_\_\_\_

In #1, enter the name and date of the documents that you wish to have sealed.

- ☒ 1. I request that the following document(s) be sealed:

Name of Document	Date of Filing
Summons and Complaint (Temporary)	June 23, 2021

Use GF-242A to request redaction of Social Security, driver license, financial accounts, and other protected numbers to the court.

Some documents are confidential by law and do not require a motion to seal. See GF-244 for information about these documents.

- ☐ 2. I request that the following type of information be redacted from the court record:

Location in the Court Record		
Type of Information to be Redacted	Date of Proceeding	Page and Line Number

In #2, describe the type of info you wish to have redacted. For example, "Petitioner's home address", date of the documents and exact location of the information. Note every place where the information appears. The court is not responsible for finding the information in other places.

**Do NOT put the actual information to be redacted on this form.** Use form GF-245 to provide the information to the court.

In #4, if the court needs to consider certain facts to decide this motion, you should include a sworn affidavit setting out the information. Most circuit court records are open to the public. The court will not seal or redact records without a legal basis for the decision. You must cite statutes and case law that support your request.

3. I am filing form GF-245 to provide the sealed or redacted information to the court.

4. I am making this request based on the following law and facts:

The pleading standard governing certain claims in the Complaint requires plaintiffs to plead the precise nature of the defect affecting the Kia and Hyundai vehicles, which has made them a prime target for auto thefts. Given the "epidemic" this has created in the Milwaukee metro area, as the Milwaukee Police Department explained, we did not want to exacerbate the problem by filing a publicly available document, which explains in exacting detail how these cars are being stolen without first raising this issue with the Court and other relevant parties. We are cognizant and greatly appreciate the importance of transparent judicial proceedings and open access to judicial records. To that end, we anticipate filing a redacted copy of the Complaint that addresses these dueling concerns, but first wished to address this matter with the Court and other stakeholders given the sensitivities involved and potential impact on our community.

In #5, if you are not a party or the attorney for a party, describe your relationship to this case.

- ☐ 5. I am not an attorney or a party to this case. I am interested because:

**FILED**  
**06-28-2021**  
**John Barrett**  
**Clerk of Circuit Court**  
**2021CV003759**

**DATE SIGNED: June 28, 2021**

Electronically signed by Timothy M Witkowiak  
 Circuit Court Judge

Enter the name of the county in which this case is filed.	<b>STATE OF WISCONSIN, CIRCUIT COURT, <u>MILWAUKEE</u> COUNTY</b>		
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Enter the case number.	Case No. _____		

**Order on Motion  
To Seal or Redact  
a Court Record**

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- ☐ 4. Other: \_\_\_\_\_

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